REMARKS

Status of the claims.

Claims 1-31 were pending in this application. Claims 1-31 have been cancelled, and new claims 32-58 are submitted.

Claim Rejections under 35 U.S.C. § 112, second paragraph.

The Examiner rejected claims 1-31 under 35 U.S.C. § 112, second paragraph, as allegedly indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention, due to various instances in which the claims did not properly recite the antecedent basis for certain claim elements. Claims 1-31 have been cancelled. Withdrawal of this rejection is therefore respectfully requested.

Claim Rejections under 35 U.S.C. § 103.

The Examiner rejected claims 1-4 and 8-21 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Dharap (US 6,256,622) in view of www.yahoo.com (hereinafter "Yahoo"). Further, the Examiner rejected claims 5-7 and 22-31 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Dharap (US 6,256,622) in view of www.yahoo.com and further in view of Shoham (US 5,855,015). Claims 1-31 have been cancelled and new claims 32-58 are introduced. In an effort to advance the prosecution of this application, the Examiner's comments regarding Dharap, Yahoo and Shoham will be discussed with respect to the new claims.

New independent claims 32, 40, 45, and 51 all recite "*executing a personalized relevance interface application within the network interface application.*" Dharap, whether alone or in combination with either Shoham or Yahoo, fails to disclose or suggest this feature of the claims. The Examiner admits that Dharap does not disclose a "relevance interface" and seeks to combine Dharap with Yahoo, on the assumption that Yahoo discloses a "relevance interface" via the Yahoo directory. First, Yahoo is not and does not disclose a "relevance interface"; nonetheless the new claims recite a relevance interface that is an "*application.*" Specifically then, Yahoo does not disclose "*executing a personalized relevance interface application within the network interface application.*" As the Examiner surely knows the Yahoo directory is a collection of web pages written in HTML and which are loaded into the browser. These pages are not a

"personalized reference interface application" which *"execut[es]"* *"within the network interface application."* Instead, Yahoo generally is a collection of web pages that is read (loaded) into an "browser" or other HTML compatible client application. Accordingly, at best the combination of Dharap and Yahoo suggest that Dharap's client 104 would be capable (like a browser) of reading Yahoo's web directory. But reading Yahoo's directory web pages with Dharap's client is not executing an application within the network interface application, as claimed. That combination does not disclose the claimed methods, which recite the operation of two applications, the personalized relevance interface application and the network interface application. In Dharap, as combined with Yahoo, there is only Dharap's client application, which at best corresponds to the network interface application. There is no other *"personalized relevance interface application"* as claimed. Shoham is similarly deficient in this regard, and the combination of Dharap, Yahoo and Shoham at best suggests applying Shoham's relevance feedback method (col. 7, lines 29-31) to Dharap's client. Again, there is no suggestion of *"executing a personalized relevance interface application within the network interface application."*

For the foregoing reasons alone, the new independent claims (and their respective dependent claims) are patentable over the references, whether alone or in combination.

Further, with respect to claim 32, the combination of Dharap and Yahoo does not disclose or suggest *"organizing and displaying the retrieved objects with the personalized relevance interface application in accordance with a relevance context associated with at least one user"* as claimed. Since Yahoo does not disclose a *personalized relevance interface application*, it follows that the combination of Yahoo and Dharap cannot disclose using the personalized relevance interface application to display and organize the objects retrieved in response to the subject keyword.

Second, Yahoo does not disclose or suggest *"organizing and displaying the retrieved objects...in accordance with a relevance context associated with at least one user"* as claimed. While Yahoo may disclose a topical directory of links through which a user might browse, this topical directory is not *"organized and displayed"* in any way that is based on *"a relevance context associated with at least one user."* The Examiner's interpretation is apparently based on the disclosure that once a Yahoo user traverses to the end of a browsing node, the results listed are ordered by their potential relevance to the topic node. However, though Yahoo may disclose organizing a collection of content pointers according to relevance, it does not disclose organizing

the collection of content pointers according to "*a relevance context associated with at least one user.*" The relevance ordering disclosed by Yahoo appears to be determined based on keyword analysis or editorial selection by Yahoo editors, and not on relevance to a user.

For these additional reasons, independent claim 32 (and its respective dependent claims) is patentable over the references, whether alone or in combination.

Independent claim 40 additionally recites "*evaluating with the personalized relevance interface application a content indicia of the particular object accessed and automatically retrieving an additional set of objects from the object space, each retrieved object associated with the content indicia*". Again, since Yahoo is not a "*personalized relevance interface application*" it follows that cannot "*evaluat[e]*" "*a content indicia of the particular object accessed*". Further, there is simply no disclosure or suggestion that Yahoo "*automatically retriev[es] an additional set of objects from the object space, each retrieved object associated with the content indicia*" that has been evaluated. Again, Yahoo as cited by the Examiner is merely a passive directory that the user traverses. Accordingly the combination of Dharap, Yahoo and Shoham simply does not disclose or suggest that Yahoo evaluate content indicia for accessed objects, and then automatically retrieve additional objects.

For these additional reasons, independent claim 40 (and its respective dependent claims) is patentable over the references, whether alone or in combination.

Claim 45 additionally recites:

> enabling a user to browse through a plurality of objects within the object space using the
> > personalized relevance interface application;
> enabling the user to access particular ones of the objects; and
> assigning with the personalized relevance interface application each such accessed
> > object to a position within the context relevant hierarchy.

The cited references, whether alone or in combination also fail to disclose or suggest these operations. Assuming for the sake of argument that the combination of Dharap and Yahoo discloses the user browsing Yahoo's topical directory and accessing objects in such directory, there is simply nothing in any of the references which discloses or suggests that the user can then assign such accessed object "*a position within the context relevant hierarchy.*" Yahoo simply does not disclose that a user can change the position of objects in the topical directory, let alone assign an object to a position in a "*context relevant hierarchy*" as claimed. Indeed, enabling

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every user could re-arrange Yahoo's topical directory as they saw fit, would result in a complete disorganization of Yahoo's directory. This would impermissibly change the principle of operation of Yahoo (providing a consistent organized topical directory for all users), and thus cannot be used in support of a rejection under §103. *See*, MPEP 2143.01 (at p. 2100-0132).

For these additional reasons, independent claim 45 (and its respective dependent claims) is patentable over the references, whether alone or in combination.

Independent claim 51 recites *"adaptively arranging with the personalized relevance interface application the position of accessed objects in the context relevant organization in accordance with a user's browsing interaction behavior metric describing user behavior."* Again, the cited references, whether alone or in combination also fail to disclose or suggest this operation. There is simply no suggestion in Dharap, Yahoo or Shoham, that, for example, Yahoo could *"adaptively arrange"* objects in its topical directory according to a *"user's browsing interaction behavior metric"*. In particular, Shoham merely discloses using "feedback" "to modify the heuristics so that subsequent exploration will be guided toward more desirable information resources." Assuming only for the sake of argument that Shoham's "feedback" can be likened to the claimed "user browsing interaction metric," there is no suggestion of using this feedback to "adaptively arrange" the position of objects in a context relevance organization. Instead, Shoham uses relevance feedback to modify "heuristics"--adjusting of rules--govern which links in a network are explored—this is different from changing the positioning of objects themselves.

For these additional reasons, independent claim 51 (and its respective dependent claims) is patentable over the references, whether alone or in combination.

CONCLUSION

Withdrawal of the pending rejections and reconsideration of the new claims are respectfully requested, and a notice of allowance is respectfully request. If the Examiner has any questions concerning this Response, the Examiner is invited to telephone Applicants' representative at (415) 875-2410.

Respectfully submitted,
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